

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

KEVIN WEBB, <i>et. al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	CIVIL ACTION NO. 4:14-cv-03302
	§	CONSOLIDATED WITH
v.	§	
	§	<i>Adams v. Livingston</i> , 4:14-cv-03326
	§	<i>Togonidze v. Livingston</i> , 4:14-cv-03324
BRAD LIVINGSTON, <i>et. al.</i>	§	for pretrial & discovery.
	§	
<i>Defendants.</i>	§	JURY DEMAND
	§	

**PLAINTIFFS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES**

**Exhibit 7**  
**Summary Exhibit of Global Document Index**  
**Entries Referred to by TDCJ's Supplemental**  
**Responses to Interrogatories**

<b>Index</b>	<b>ROG</b>	<b>Bates labels</b>	<b>Description (from TDCJ Index, Exhibit 6)</b>
14	3, 4	TDCJ 1075-1783	Emails and Attachments from Phyllis McWhorter, sent by Lannette Linthicum, pertaining to Offender Heat Related Illness during calendar year 2011.
15	3, 4	TDCJ 1784-2773	Emails and Attachments from Phyllis McWhorter, sent by Lannette Linthicum, pertaining to Offender Heat Related Illness during calendar year 2012.
16	3, 4	TDCJ 2774-3616	Emails and Attachments from Phyllis McWhorter, sent by Lannette Linthicum, pertaining to Offender Heat Related Illness during calendar year 2013.
63	3	TDCJ 7402-7900	Dr. Linthicum's Heat Related File Folder Correspondence 1998-2011.
66	3	TDCJ 8092-8155	TDCJ Health Services Division, Heat Related Morbidity and Mortality Reports 2011, 2012, and 2013. Kathryn Buskirk, Director of Quality Monitoring and Compliance.
67	3	TDCJ 8156-8418	TDCJ Health Services Division, Heat Related Miscellaneous Documents 2011 - September 10, 2014. Kathryn Buskirk, Director of Quality Monitoring and Compliance.
68	3	TDCJ 8419-8925	TDCJ Health Services Division, Heat Related Emails May 5, 2011 through September 10, 2014. Kathryn Buskirk, Director of Quality Monitoring and Compliance.
79	2-6	TDCJ 9677-9683	ESI agreement regarding ESI production. Correspondence dated October 27, 2014, signed by Sean Flammer, which includes email string.
80	2-6	TDCJ 9684-14966	TDCJ O365 ESI, TXPROD002.001
81	2-6	TDCJ 14967-32082	TDCJ O365 ESI, TXPROD002.002
82	2-6	TDCJ 32083-32226	TDCJ O365 ESI, TXPROD002.003
83	2-6	TDCJ 32227-38754	TDCJ O365 ESI, TXPROD002.004
84	2-6	TDCJ 38755-42896	TDCJ O365 ESI, TXPROD002.005
85	2-6	TDCJ 42897-49842	TDCJ O365 ESI Privilege Log Documentation Referenced. Additional explanation to follow.
86	3	TDCJ 49843-49994	TDCJ Health Services Division, heat related Lotus notes emails of Phyllis McWhorter from 2011 to October 24, 2014, with supporting affidavit signed by Phyllis McWhorter, dated October 28, 2014.

Index	ROG	Bates labels	Description (from TDCJ Index, Exhibit 6)
100	3	TDCJ 50399-51019	TDCJ Health services division hard copy search for heat and temperature related documentation from Phyllis McWhorter. Records from 2009-2014.
124	2-6	TDCJ 52102-53039	TXPROD003 (Dead Email Files) Second Component of Defendants' Seventh Supplemental Disclosures to Plaintiffs, sent via secure link share email.
125	2-6	TDCJ 53040-53064	Privilege Log 4 (PRivLog4), pending additional compilation.
126	2-6	TDCJ 53065-60772	TDCJ Information Technology Division, Responsive Mainframe Archive Documentation, September 2011.
127	2-6	TDCJ 60773-68699	TDCJ Information Technology Division, Responsive Mainframe Archive Documentation, April 2012.
128	2-6	TDCJ 68700-75958	TDCJ Information Technology Division, Responsive Mainframe Archive Documentation, September 2014.
147	2-6	TDCJ 76237-76560	TDCJ EMS List of Users as of March 4, 2015.
291	5, 6	TDCJ 82925-83430	TDCJ Administrative Review & Risk Management, Risk Management Executive Summaries of Employee & Offender Injuries & Workers' Compensation Claims Cost, January 2013 through July 2015.
292	5, 6	TDCJ 83431-83494	TDCJ Administrative Review & Risk Management, Risk Management Executive Summaries of Employee & Offender Injuries & Workers Compensation Claims Costs, from May 2011, through December 2011.
295	2, 3	TDCJ 83509-83626	TDCJ Mortality Report 2010-2014, provided by UTMB-CMC.
296	2, 3	TDCJ 83627-83753	TDCJ Executive Services, TDCJ Offender Statewide Mortality Data by Immediate Cause of Death, from Calendar Year 2007-2014.
297	2, 3	TDCJ 83754-83755	TDCJ Executive Services, Offender Mortality Incidence, by Calendar year & Heat Related Period, 2004-2014.
318	23	TDCJ 85324-85341	TDCJ Maintenance Department, Facilities Division; installation and maintenance costs associated with HVAC system for TDCJ Units from FY2010 to present, with affidavit dated October 27, 2015.
358	24	TDCJ 85339a	TDCJ Maintenance Department, Facilities Division New Installed AC Projects, September 2009 through June 2015, component of Global Index #318.
360	24	TDCJ 89622-89677	TDCJ Facilities Division Project Master File, Lewis Unit AC Project.
361	24	TDCJ 89678-89722	TDCJ Facilities Division Project Master File, Mountain View Unit AC Project.

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362	24	TDCJ 89723-89780	TDCJ Facilities Division Project Master File, Stiles Unit AC Project.
363	24	TDCJ 89781-89834	TDCJ Facilities Division Project Master File, Stringfellow Unit AC Project.
364	5, 6	TDCJ 89835-90071	TDCJ Emergency Action Center, employee heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (1 of 12)
365	5, 6	TDCJ 90072-90318	TDCJ Emergency Action Center, employee heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (2 of 12)
366	5, 6	TDCJ 90319-90542	TDCJ Emergency Action Center, employee heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (3 of 12)
367	5, 6	TDCJ 90543-90785	TDCJ Emergency Action Center, employee heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (4 of 12)
368	5, 6	TDCJ 90786-91051	TDCJ Emergency Action Center, employee heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (5 of 12)
369	3, 4	TDCJ 91052-91311	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (6 of 12)
370	3, 4	TDCJ 91312-91559	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (7 of 12)
371	3, 4	TDCJ 91560-91816	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (8 of 12)
372	3, 4	TDCJ 91817-92057	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (9 of 12)
373	3, 4	TDCJ 92058-92368	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (10 of 12)
374	3, 4	TDCJ 92369-92597	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (11 of 12)
375	3, 4	TDCJ 92598-92790	TDCJ Emergency Action Center, offender heat related documents, with supporting affidavit by Jill Lewis dated November 13, 2015. (12 of 12)